

06248 RF 94

States Government

Department of Energy

Rocky Flats Office

DUE
DATE 4-30-94

Memorandum



000023597

MAR 28 1994

ER SRG 03462

Operable Unit No 2 Subsurface Interim Measure/Interim Remedial Action Test No 1
Operational DelaySue Stuger Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats Inc

In a letter dated March 18 1994 (94-RF 03289) EG&G informed the Department of Energy (DOE) Environmental Restoration (ER) of a three week delay in completion of the Operable Unit (OU) No 2 Subsurface Interim Measure/Interim Remedial Action (IM/IRA) Soil Vapor Extraction (SVE) Test No 1 This operational delay is due to the inability of the OU 1 and OU 2 IM/IRA treatment systems to accommodate OU 2 extracted ground water

The Environmental Protection Agency (EPA) the Colorado Department of Health (CDH) and DOE have repeatedly stated that they fully expect the IM/IRA to treat incidental waters at the Rocky Flats Plant (RFP) Moreover in the document approved by EPA and CDH Final Subsurface Interim Measures/Interim remedial Action Plan (IM/IRAP)/Environmental Assessment and Decision Document dated July 28 1992 Section 4.6 alternative water treatment facilities were addressed The document states the following

"The Subsurface IM/IRA considers the use of existing or planned RFP water treatment facilities for **treatment of contaminated ground water** and condensate associated with operation of the proposed vapor extraction systems at the 903 Pad Mound and East Trenches Areas DOE wishes to retain the South Walnut Creek Basin Surface Water Treatment System as the **preferred system** at this time Modifications to this initial strategy may be made as part of the observational/streamlined approach [for] **ground water treatment**

Also EPA and CDH have stated that they expect the SVE to operate without delays after their approval of two project milestone extensions Listed in Attachment A are some of the pertinent correspondence related to this issue

The conditions creating the three week delay of Test No 1 were reasonably foreseeable and should have been proactively resolved by EG&G The ground water treatment issue was identified during IM/IRAP development prior to July 1992 Additionally EPA and CDH identified the problem in the EPA and CDH letter dated February 11 1993 The issue was identified early enough to give EG&G ample lead time to design a solution for SVE ground water treatment.

ACTION	DIST	TR	ENC
BERMAN, H.S.			
CARNIVAL, G.J.			
COPP, R.D.			
CORDOVA, R.C.			
DAVIS, J.G.			
FERRERA, D.W.			
FRANZ, W.A.			
HANNI, B.J.			
HEALY, T.J.			
HEDAH, T.G.			
HILBIG, J.G.			
HUTCHINS, N.M.	XX		
KELL, R.E.			
KIRBY, W.A.			
KUESTER, A.W.			
MAHAFFEY, J.W.			
MANN, H.P.	XX		
MARX, G.E.			
MCKENNA, F.G.			
MORGAN, R.V.			
PIZZUTO, V.M.			
POTTER, G.L.			
SANDLIN, N.B.			
SATTERWHITE, D.G.			
SCHUBERT, A.L.			
SETLOCK, G.H.			
TIGER, S.G.	XX		
ULLIVAN, M.T.			
SWANSON, E.R.			
WILKINSON, R.B.	X		
WILSON, J.M.	X		
Laurin, P.	XX		
Klein, M.	XX		
Madel, R.	XX		
Brussard, M.	XX		
Busby, W.	XX		
Frimrose, A.	XX		
Vess, T.	XX		
Burmeister, M.	XX		
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DOE ORDER # 5460.1

ADMIN RECORD

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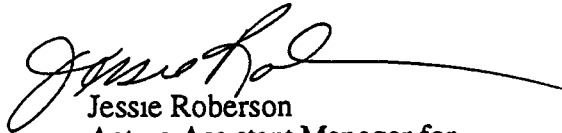
MAR 28 1994

Because EPA and CDH approved the IM/IRAP they expect the OU 1 and OU 2 treatment facilities to treat incidental waters generated by ER activities. The DOE is concerned about meeting this documented IM/IRAP commitment.

Therefore we request that EG&G provide ER within three weeks of receipt of this letter a detailed plan of how Environmental Operations Management (EOM) intends to treat incidental waters. The plan should include future programmatic barriers, solutions to those barriers, and a schedule detailing when incidental water treatment will be viable at the IM/IRA treatment units.

Finally ER expects you to initiate the steps necessary to handle/treat the ground water extracted from the SVE so that testing and continued operations can be completed without impacting the next milestone date. The next milestone date for the SVE is May 30, 1994 for the completion of Test No. 1.

If you have any questions please contact Scott Grace at extension 7199.


Jessie Roberson
Acting Assistant Manager for
Environmental Restoration

Attachment

cc w/Attachment
A Rampertaap EM 453
M Silverman OOM RFO
L Smith OOM RFO
B Williamson ER RFO
E Dillé ER RFO
H Mann EG&G
P Laurin EG&G
M Klein EG&G
R Madel EG&G
M Broussard EG&G
W Busby EG&G
A Primrose EG&G
T Vess EG&G
M Burmeister EG&G
CPAF File

Attachment A

Surface Water IM/IRA.

EG&G letter dated December 20 1993 93 RF 15469 P Laurin to S Grace Attachment A, "The representative from CDH would like an evaluation of the FTU and its ability to treat more highly contaminated water (e g Decontamination Pad Water)

CDH letter dated December 7 1993 G Baughman to R. Schassburger these treatment technologies be evaluated for Rocky Flats Plant applications

EPA letter dated November 23 1993 M Hestmark to R. Schassburger recommendations should be included as to what limiting conditions would be required to make operation of the system appropriate and economical

EG&G letter dated October 29 1993 93 RF 13452 M Broussard to R. Schassburger Waste reduction chemical use reduction and treatment facility optimization will also continue to be explored/implemented in order to make the FTU a more efficient treatability unit.

Subsurface IM/IRA. Soil Vapor Extraction.

EPA letter dated March 10 1994 G Baughman to R. Schassburger the expectation that DOE will continue developing measures to address long term operation [of the SVE]

EPA letter dated February 10 1994 M Hestmark to R. Schassburger Please note that previous extensions were granted with the expectation that the extra time will be used to develop contingent treatment systems for long term operation To date we have seen no evidence of progress on either one of these items Also Failure to meet this expectation will violate the terms of schedule extensions granted to date for the Subsurface IM/IRA and leave DOE and EG&G subject to enforcement actions

DOE memorandum dated February 8 1994 M McBride to S Stuger

EPA letter dated November 4 1993 M Hestmark and G Baughman to R. Schassburger expectation that to develop contingent treatment systems for possible long term operation

DOE memorandum dated December 17 1993 M McBride to N Hutchins EPA expects the duration of the extension to be used to accomplish the following Develop contingent treatment systems for possible use in long term operation

EPA letter dated August 12 1993 M Hestmark to R. Schassburger determination must be made to the viability of using the South Walnut Creek Treatment Plant to treat contaminated ground water extracted during the SVE testing This matter was not addressed in the test plan for Site No 2 and must be resolved.

EPA letter dated February 11 1993 M Hestmark to R. Schassburger One concern remains as to the ability of the South Walnut Creek Treatment Plant to treat the waste water to be produced during the SVE testing It is imperative that a determination of the viability of this option be made as soon as possible to avoid the delay associated with switching to another treatment location in the event that South Walnut Creek is found unsuitable